

Bradley Cleveland

[REDACTED] Oakland, CA 94606  
[REDACTED]

14 January, 2014

California Coastal Commission  
c/o Sea-Level Rise Work Group  
[SLRGuidanceDocuments@coastal.ca.gov](mailto:SLRGuidanceDocuments@coastal.ca.gov)

Re Public comments on the Sea-Level Rise Guidance Draft

I offer these comments on your draft guidance document.

1. **Rapid and slow onset events:** While sea-level rise will trigger slow onset events, such as coastal inundation, there are also rapid onset disasters — storm surges and flooding related to extreme storm events — that will be exacerbated by SLR. The draft should distinguish between these two distinct types of events — slow and rapid onset because they may necessitate different or additional steps, as outlined in Section IV, Local Coastal Programs, and Section V, Coastal Development Permits.
2. **Coastal Commission jurisdiction:** There is no reference to the fact that the commissions geographic jurisdiction will change over time as the coast migrates inland in response to sea-level rise. It might be useful for Local Coastal Programs to consider this changing geographic jurisdiction, when the best available science indicates a significant change in the coastline.
3. **Introduction, p17:** The draft states that California has lost ""90% of coastal wetlands, and erosion and flooding currently pose risks to many of the remaining coastal ecosystems." While the introduction references the risks posed by SLR, it fails to mention that coastal communities also have the opportunity to restore old or establish new coastal ecosystems as the coastline changes. Some of these opportunities are listed in later sections, such as Section 4.4, "Update policies to provide for new or restored coastal habitat." But the draft document will be stronger if it highlights potential opportunities, and not just enumerate the threats.
4. **Section IV, Local Coastal Programs:** Draft language should be strengthen to direct local governments to identify key areas that might be protected by acquisitions, rolling easements, or other means to allow coastal ecosystems to migrate inland in response to SLR. As local governments identify these key areas, they should seek to conserve and restore landscape linkages and connectivity to allow diverse species to migrate to new locations.

Thanks for your time.

Sincerely yours,  
Bradley Cleveland